REMARKS/ARGUMENTS

The Office Action mailed February 10, 2005 has been carefully considered. Reconsideration in view of the following remarks is respectfully requested.

In the specification, the paragraph **[0011]** has been amended to correct minor editorial problems. Specifically, "media access control" was spelled out for "MAC". No new matter has been added.

Claims 1-11 have been canceled, without prejudice or disclaimer of the subject matter contained therein.

Claims 12, 18, 18, 25, 31, 38, 39, and 40 have been amended to remove elements and correct an antecedent basis problem. No new matter has been added.

New claims 41-48 also particularly point out and distinctly claim subject matter regarded as the invention. Support for these claims may be found in the specification, paragraphs **[0039]** through **[0049]**.

The 35 U.S.C. § 102 Rejection

Claims 1-40 were rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by Muller et al.[1] This rejection is respectfully traversed.

[1] U.S. Patent No. 5,938,736

According to the M.P.E.P., a claim is anticipated under 35 U.S.C. § 102(a), (b) and (e) only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.[2]

As to claims 1-11, these claims have been canceled. Thus, the rejection is now moot as to these claims.

The Office Action states:

> As to claims 12, 25, 38, Muller et al. disclose a method and apparatus and program storage device for handling a control message from a router, the method comprising: updating a source-group data structure using information from the control message, the source-group data structure containing data regarding a multicast group; and adding an outgoing port index to said source-group table, said outgoing port index identifying a port that received the control message (see col. 6, lines 39-55) (it is considered that when the MAC address is updating, also a source group data structure is updating and output port is added to the group table (entries).

Applicant respectfully disagrees for the following reasons.

Muller does not teach "handling a control message" or "updating a source-group data structure using information from the control message"

Contrary to what is stated in the Office Action, Muller does not teach anything about control messages. In Muller, layer 2 based learning is applied to traffic that passes through the switching device. See Muller, col. 6, lines 47-55. When the traffic enters the switching device, the system correlates the source address of the packet with the port on which it came in. These

[2] Manual of Patent Examining Procedure (MPEP) § 2131. See also *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

packets, however, are clearly not control packets, they are content packets. The invention in Muller is only concerned with how a forwarding table is used when traffic comes in. It is not concerned with how to build the forwarding table in the first place (using control messages and a source-group data structure, as specified in claims 12, 25, and 38). As such, it does not teach a method for handling a control message, or the element of "updating a source-group data structure using information from the control message".

Muller does not teach a source-group data structure

Muller also fails to teach a source-group data structure. A source-group data structure is taught in the Specification, page 11, paragraph 40, as including "various data about the members of a multicast group." Most importantly, the source-group data structure is distinguished from a forwarding table in both the Specification and the claims. The Office Action attempts to equate a source group data structure with a forwarding table in Muller, but these two types of data structures are not the same, as evidenced by their different uses throughout the Specification and claims. As such, Muller does not teach a source-group data structure as claimed.

Thus, for the above reasons, Applicant respectfully submits that claims 12, 25, and 38 are in condition for allowance.

The Office Action further states:

> As to claims 16, 29, 39, Muller et al. disclose a method and apparatus for handling a control message from a router, the method comprising: deriving an explicit source lookup key (search key) from the control message (See abstract); retrieving an outgoing port index associated with an entry in a session data structure, the entry corresponding to the explicit source lookup key (see col. 3,

lines 30-52); and updating an outgoing lookup table entry corresponding to the outgoing port index with information regarding designated devices in the multicast group indicated by the control message (see col. 6, lines 39-55).

Applicant respectfully disagrees for the following reasons.

Muller does not teach "handling a control message" or "deriving an explicit source lookup key from the control message"

As stated above, Contrary to what is stated in the Office Action, Muller does not teach anything about control messages. In Muller, layer 2 based learning is applied to traffic that passes through the switching device. See Muller, col. 6, lines 47-55. When the traffic enters the switching device, the system correlates the source address of the packet with the port on which it came in. These packets, however, are clearly not control packets, they are content packets. The invention in Muller is only concerned with how a forwarding table is used when traffic comes in. It is not concerned with how to build a session table (using control messages and an explicit source lookup key, as specified in claims 16, 29, and 39). As such, it does not teach a method for handling a control message

Muller does not teach "a session data structure"

Contrary to what is stated in the Office Action, Muller does not teach "a session data structure" as claimed in claims 16, 29, and 39. The Office Action cites col. 3, lines 30-52 as evidence of such a teaching. However, this section of Muller describes a forwarding table, not a session data structure. A session data structure would be known to one of ordinary skill in the art as a data structure that holds information about one or more sessions, which are connections

between users and servers in the computer network. Most importantly, the session data structure is distinguished from a forwarding table in both the Specification and the claims. The data structure in Muller, however, is a forwarding table, which contains does not contain session information, but instead contains information on where to forward incoming packets. As such, Muller does not teach a session data structure as claimed.

Muller does not teach "updating an outgoing lookup table entry corresponding to said outgoing port index with information regarding designated devices in said multicast group indicated by the control message"

Contrary to what is stated in the Office Action, Muller fails to teach this element. The Office Action cites col. 6, lines 39-55 as evidence of such a teaching. However, Muller does not describe an outgoing lookup table entry, nor its updating. Muller merely teaches the recording of an input port upon which a packet arrives, and does not describe an outgoing port index or a corresponding outgoing lookup table entry. Additionally, Muller does not describe updating any type of entry with information regarding designated device in a multicast group indicated by a control message. As such, Muller fails to teach "updating an outgoing lookup table entry corresponding to said outgoing port index with information regarding designated devices in said multicast group indicated by the control message" as claimed in claims 16, 29, and 39.

Thus, Applicant respectfully submits that claims 16, 29, and 39 are in condition for allowance.

Independent claims 18, 31, and 40 contain elements similar to that as described above with respect to claims 12, 25, and 38 and 16, 29, and 39, and Applicant respectfully submits that these claims are also in condition for allowance.

As to dependent claims 13-15, 17, 19-24, 26-28, 30 and 32-37, the argument set forth above is equally applicable here. The base claims being allowable, the dependent claims must also be allowable.

In view of the foregoing, it is respectfully asserted that the claims are now in condition for allowance.

Conclusion

It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited.

If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,

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Dated: 4/25/05

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